

1 Elayna J. Youchah
Nevada State Bar No. 5837
2 Kirsten A. Milton
Nevada State Bar. No. 14401
3 **JACKSON LEWIS P.C.**
3800 Howard Hughes Pkwy, Suite 600
4 Las Vegas, Nevada 89169
Tel: (702) 921-2460
5 Email: youchahe@jacksonlewis.com
Email: kirsten.milton@jacksonlewis.com

6 *Attorneys for Defendant*
7 *Dignity Health*

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 MEGAN E. KLATT, an individual, on behalf
12 of herself and all others similarly situated,

13 Plaintiff,

14 vs.

15 DIGNITY HEALTH, a California corporation;
DOES 1-50, unknown individuals; and ROE
16 COMPANIES 1-50, unknown business
entities,

17 Defendants.
18

Case No. 2:17-cv-02425-RFB-PAL

**STIPULATION TO SET BRIEFING
SCHEDULE FOR MOTION FOR
PARTIAL SUMMARY JUDGMENT**

19 Plaintiff Megan E. Klatt ("Plaintiff") and Defendant Dignity Health ("Defendant"), by and
20 through their respective counsels of record, submit this stipulation setting a briefing schedule
21 arising from Plaintiff's Motion for Partial Summary Judgment ("Plaintiff's Motion") filed on
22 February 12, 2018.

23 After consulting regarding defense counsel's availability, which includes out of state travel,
24 multiple depositions, and discovery in other cases, all of which was calendared before Plaintiff's
25 Motion was filed, the parties agree to the following briefing schedule for Defendant's Opposition
26 to Plaintiff's Motion, and Plaintiff's Reply in support thereof. Specifically, Defendant shall have
27 through and including March 19, 2018 to file its Opposition to Plaintiff's Motion. Plaintiff shall
28 have through and including April 16, 2018 to file her Reply.

STIPULATION

NOW THEREFORE, the parties hereby agree and stipulate as follows:

The deadline for Defendant to file its Opposition to Plaintiff's Motion shall be through and including March 19, 2018.

The deadline for Plaintiff to file her Reply in Support of her Motion shall be through and including April 16, 2018.

This stipulation is offered in good faith and not for purposes of delay.

DATED this 27th day of February, 2018.

SEMENZA KIRCHER RICKARD

/s/ Lawrence J. Semenza III

Lawrence J. Semenza, III, Esq., Bar No. 7174
Christopher D. Kircher, Esq., Bar No. 11176
Jarrod L. Rickard, Esq., Bar No. 10203
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

*Attorneys for Plaintiff Megan E. Klatt
and all others similarly situated*

JACKSON LEWIS P.C.

/s/ Elayna J. Youchah

Elayna J. Youchah, Esq., Bar No. 5837
Kirsten A. Milton, Esq., Bar No. 14401
3800 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169

Attorneys for Defendant Dignity Health

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
United States District Judge

DATED this 28th day of February, 2018.